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July 14, 2015

VIA ECF

Honorable Thomas P. Griesa
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *In re Tremont Sec. Law, State Law and Ins. Litig.*, No. 08 Civ. 11117 (TPG) (S.D.N.Y.)

Dear Judge Griesa:

We respond to Class Counsel's letter filed earlier today (ECF 1099) asking the Court to change the briefing schedule on the motion filed by Mr. Martin ("Martin Motion") (ECF 1093), which was approved by the Court today (ECF 1098), and provides for the filing of opposition papers to the Martin Motion by August 13, 2015, and the filing of reply papers by August 20, 2015.

Preliminarily, contrary to Class Counsel's letter, the above briefing schedule is consistent with the briefing schedule approved by the Court for Class Counsel's motion. Specifically, Class Counsel's motion was filed on July 10, 2015 (ECF 1088), and provides thirty (30) days for opposition papers (i.e., until August 10, 2015), and seven (7) days for reply papers (i.e., until August 17, 2015).

Similarly, the Martin Motion was filed on July 13, 2015, and provides thirty (30) days for opposition papers (i.e., until August 13, 2015), and seven (7) days for reply papers (i.e., until August 20, 2015).

In their letter, Class Counsel proposes that our reply papers for the Martin Motion be filed on August 10, 2015 – the same day that our opposition to Class Counsel's Motion is due. That request imposes an impossible burden on us, and is highly unreasonable.

However, since Class Counsel has communicated a willingness to shorten the opposition period to the Martin Motion, as a compromise we propose that opposition papers to the Martin Motion be filed by August 10, 2015 (the same day that opposition papers are due on Class Counsel's Motion), and that reply papers on the Martin Motion be filed by August 17, 2015 (the same day that reply papers are due on Class Counsel's Motion). With such a schedule, neither side "gets the last word," and all motion papers will be on file with the Court by Monday, August 17, 2015 – a week prior to the scheduled hearing on August 24, 2015.

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We are available at the Court's convenience for a conference concerning this matter.

Respectfully submitted,

/s/ J. Elazar Fruchter

J. Elazar Fruchter

cc: All counsel via ECF